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19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO DIVISION

22 IN RE: UBER TECHNOLOGIES, INC.,
23 PASSENGER SEXUAL ASSAULT
24 LITIGATION

Case 3:23-md-03084-CRB

MDL No. 3084

25 **ATTORNEY WALT CUBBERLY'S**
26 **DECLARATION IN SUPPORT OF**
27 **WILLIAM HART & BOUNDAS**
28 **PLAINTIFFS' MEMORANDUM OF LAW**
IN SUPPORT OF OPPOSITION TO
DEFENDANTS' MOTION REGARDING
ALLEGEDLY FRAUDULENT PLAINTIFF
FACT SHEETS

29 This Document Relates to:

30 *WHB 1478 v. Uber Technologies, Inc., et*
31 *al., No. 3:24-cv-04833*

32 *WHB 1123 v. Uber Technologies, Inc., et*
33 *al., No. 3:24-cv-04850*

34 *WHB 1144 v. Uber Technologies, Inc., et*
35 *al., No. 3:24-cv-04859*

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1
2 *WHB 196 v. Uber Technologies, Inc., et al.,*
3 *No. 3:24-cv-04886*
4 *WHB 526 v. Uber Technologies, Inc., et al.,*
5 *No. 3:24-cv-04901*
6 *WHB 950 v. Uber Technologies, Inc., et al.,*
7 *No. 3:24-cv-04931*
8 *WHB 1936 v. Uber Technologies, Inc., et*
9 *al., No. 3:24-cv-04950*
10 *WHB 1387 v. Uber Technologies, Inc., et*
11 *al., No. 3:24-cv-04958*
12 *WHB 175 v. Uber Technologies, Inc., et al.,*
13 *No. 3:24-cv-04982*
14 *WHB 1916 v. Uber Technologies, Inc., et*
15 *al., No. 3:24-cv-05003*
16 *WHB 1845 v. Uber Technologies, Inc., et*
17 *al., No. 3:24-cv-05015*
18 *WHB 979 v. Uber Technologies, Inc., et al.,*
19 *No. 3:24-cv-05082*
20 *WHB 649 v. Uber Technologies, Inc., et al.,*
21 *No. 3:24-cv-05095*
22 *WHB 1425 v. Uber Technologies, Inc., et*
23 *al., No. 3:24-cv-05129*
24 *WHB 427 v. Uber Technologies, Inc., et al.,*
25 *No. 3:24-cv-05132*
26 *WHB 1382 v. Uber Technologies, Inc., et*
27 *al., No. 3:24-cv-05232*
28 *WHB 428 v. Uber Technologies, Inc., et al.,*
No. 3:24-cv-05236
WHB 1962 v. Uber Technologies, Inc., et
al., No. 3:24-cv-05240
WHB 1048 v. Uber Technologies, Inc., et
al., No. 3:24-cv-05462
WHB 1443 v. Uber Technologies, Inc., et
al., No. 3:24-cv-05472
WHB 1673 v. Uber Technologies, Inc., et
al., No. 3:24-cv-05552

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2 *WHB 519 v. Uber Technologies, Inc., et al.,*
3 *No. 3:24-cv-05627*

4 *WHB 393 v. Uber Technologies, Inc., et al.,*
5 *No. 3:24-cv-05633*

6 *WHB 1416 v. Uber Technologies, Inc., et*
7 *al., No. 3:24-cv-05667*

8 *WHB 2052 v. Uber Technologies, Inc., et*
9 *al., No. 3:25-cv-01129*

10 *WHB 2045 v. Uber Technologies, Inc., et*
11 *al., No. 3:25-cv-01211*

12 I, Walt Cubberly, declare as follows:

- 13 1. I am an attorney at Williams Hart & Boundas LLP admitted to practice before the courts
14 of the State of California. I am one of the counsels of record for all filed WHB claimants.
15 I have personal knowledge of the matters set forth herein, and if called to testify, I would
16 testify competently to the information below:
- 17 2. This declaration is made in support of Plaintiffs' Opposition to Defendants' Motion
18 Regarding Allegedly Fraudulent Plaintiff Fact Sheets.
- 19 3. Attached as **Exhibit A** is a true and correct copy of Williams Hart & Boundas Plaintiffs'
20 Memorandum of Law in Support of Opposition to Defendants' Motion to Dismiss Cases
21 for Failure to Comply With PTO 10.
- 22 4. Attached hereto as **Exhibit B** is a true and correct copy of Williams Hart & Boundas Plaintiffs'
23 Rule 26(g) Certification Pursuant to the Court's Order Dated November 19, 2025.
- 24 5. Attached hereto as **Exhibit C** is a true and correct copy of the Notice of Voluntary
25 Dismissal of Plaintiff WHB 1478, Id 1546.
- 26 6. Attached hereto as **Exhibit D** is a true and correct copy of the Notice of Voluntary
27 Dismissal of Plaintiff WHB 1144, Id 1567.

- 1 7. Attached hereto as **Exhibit E** is a true and correct copy of the Notice of Voluntary
2 Dismissal of Plaintiff WHB 196, Id 1573.
- 3
- 4 8. Attached hereto as **Exhibit F** is a true and correct copy of the Notice of Voluntary
5 Dismissal of Plaintiff WHB 526, Id 1614.
- 6
- 7 9. Attached hereto as **Exhibit G** is a true and correct copy of the Notice of Voluntary
8 Dismissal of Plaintiff WHB 1936, Id 1653.
- 9
- 10 10. Attached hereto as **Exhibit H** is a true and correct copy of the Notice of Voluntary
11 Dismissal of Plaintiff WHB 1123, Id 1659.
- 12
- 13 11. Attached hereto as **Exhibit I** is a true and correct copy of the Notice of Voluntary
14 Dismissal of Plaintiff WHB 950, Id 1681.
- 15
- 16 12. Attached hereto as **Exhibit J** is a true and correct copy of the Notice of Voluntary
17 Dismissal of Plaintiff WHB 175, Id 1697.
- 18
- 19 13. Attached hereto as **Exhibit K** is a true and correct copy of the Notice of Voluntary
20 Dismissal of Plaintiff WHB 1916, Id 1702.
- 21
- 22 14. Attached hereto as **Exhibit L** is a true and correct copy of the Notice of Voluntary
23 Dismissal of Plaintiff WHB 649, Id 1712.
- 24
- 25 15. Attached hereto as **Exhibit M** is a true and correct copy of the Notice of Voluntary
26 Dismissal of Plaintiff WHB 1845, Id 1725.
- 27
- 28 16. Attached hereto as **Exhibit N** is a true and correct copy of the Notice of Voluntary
Dismissal of Plaintiff WHB 970, Id 1770.
17. Attached hereto as **Exhibit O** is a true and correct copy of the Notice of Voluntary
Dismissal of Plaintiff WHB 427, Id 1866.
18. Attached hereto as **Exhibit P** is a true and correct copy of the Notice of Voluntary
Dismissal of Plaintiff WHB 1425, Id 1868.

- 1 19. Attached hereto as **Exhibit Q** is a true and correct copy of the Notice of Voluntary
2 Dismissal of Plaintiff WHB 1549, Id 1885.
- 3
- 4 20. Attached hereto as **Exhibit R** is a true and correct copy of the Notice of Voluntary
5 Dismissal of Plaintiff WHB 1382, Id 1916.
- 6
- 7 21. Attached hereto as **Exhibit S** is a true and correct copy of the Notice of Voluntary
8 Dismissal of Plaintiff WHB 1962, Id 1918.
- 9
- 10 22. Attached hereto as **Exhibit T** is a true and correct copy of the Notice of Voluntary
11 Dismissal of Plaintiff WHB 1048, Id 1943.
- 12
- 13 23. Attached hereto as **Exhibit U** is a true and correct copy of the Notice of Voluntary
14 Dismissal of Plaintiff WHB 1443, Id 1950.
- 15
- 16 24. Attached hereto as **Exhibit V** is a true and correct copy of the Notice of Voluntary
17 Dismissal of Plaintiff WHB 1673, Id 1962.
- 18
- 19 25. Attached hereto as **Exhibit W** is a true and correct copy of the Notice of Voluntary
20 Dismissal of Plaintiff WHB 1416, Id 2177.
- 21
- 22 26. Attached hereto as **Exhibit X** is a true and correct copy of the Notice of Voluntary
23 Dismissal of Plaintiff WHB 519, Id 2147.
- 24
- 25 27. Attached hereto as **Exhibit Y** is a true and correct copy of the Notice of Voluntary
26 Dismissal of Plaintiff WHB 393, Id 2150.
- 27
- 28 28. Attached hereto as **Exhibit Z** is a true and correct copy of the Notice of Voluntary
Dismissal of Plaintiff WHB 2045, Id 2889.
- 29
- 30 29. Attached hereto as **Exhibit AA** is a true and correct copy of the Notice of Voluntary
Dismissal of Plaintiff WHB 2052, Id 2898.
- 31
- 32 30. Attached hereto as **Exhibit BB** is a true and correct copy of Amended Pretrial Order 10.

31. Attached hereto as **Exhibit CC** is a true and correct copy of Order Resolving Dispute Regarding Obligations Under Pretrial Order No. 10.
32. Attached hereto as **Exhibit DD** is a true and correct redacted copy of the Amended Plaintiff Fact Sheet of Plaintiff WHB 1048.
33. Attached hereto as **Exhibit EE** is a true and correct copy of the Notice of Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 1478, Id 1546.
34. Attached hereto as **Exhibit FF** is a true and correct copy of the Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 1144, Id 1567.
35. Attached hereto as **Exhibit GG** is a true and correct copy of the Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 196, Id 1573.
36. Attached hereto as **Exhibit HH** is a true and correct copy of the Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 526, Id 1614.
37. Attached hereto as **Exhibit II** is a true and correct copy of the Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 1936, Id 1653.
38. Attached hereto as **Exhibit JJ** is a true and correct copy of the Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 1123, Id 1659.
39. Attached hereto as **Exhibit KK** is a true and correct copy of the Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 950, Id 1681.
40. Attached hereto as **Exhibit LL** is a true and correct copy of the Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 175, Id 1697.
41. Attached hereto as **Exhibit MM** is a true and correct copy of the Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 1916, Id 1702.
42. Attached hereto as **Exhibit NN** is a true and correct copy of the Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 649, Id 1712.

43. Attached hereto as **Exhibit OO** is a true and correct copy of the Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 970, Id 1770.
44. Attached hereto as **Exhibit PP** is a true and correct copy of Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 1845, Id 1725.
45. Attached hereto as **Exhibit QQ** is a true and correct copy of the Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 427, Id 1866.
46. Attached hereto as **Exhibit RR** is a true and correct copy of the Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 1425, Id 1868.
47. Attached hereto as **Exhibit SS** is a true and correct copy of the Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 1549, Id 1885.
48. Attached hereto as **Exhibit TT** is a true and correct copy of the Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 1382, Id 1916.
49. Attached hereto as **Exhibit UU** is a true and correct copy of the Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 1962, Id 1918.
50. Attached hereto as **Exhibit VV** is a true and correct copy of the Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 1048, Id 1943.
51. Attached hereto as **Exhibit WW** is a true and correct copy of the Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 1443, Id 1950.
52. Attached hereto as **Exhibit XX** is a true and correct copy of the Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 1673, Id 1962.
53. Attached hereto as **Exhibit YY** is a true and correct copy of the Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 1416, Id 2177.
54. Attached hereto as **Exhibit ZZ** is a true and correct copy of the Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 393, 2150.

55. Attached hereto as **Exhibit AAA** is a true and correct copy of the Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 2045, Id 2889.

56. Attached hereto as **Exhibit BBB** is a true and correct copy of the Notice of Plaintiff Fact Sheet Deficiency for Plaintiff WHB 2052, Id 2898.

57. Attached hereto as **Exhibit CCC** is a true and correct copy of Pretrial Order 10: Fact Sheet Implementation Order.

58. I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on December 19, 2025 in Houston, Texas.

Dated: December 19, 2025

/s/ Walt Cubberly
Walt Cubberly

Attorneys for Plaintiff